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12 Attorneys for Plaintiffs/Counterdefendants

13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
18 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26
27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE SANFT
LAW INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 39) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 SANFT LAW (non-party herein after referred to as "SANFT") hereby stipulate and agree as follows:

5 1. Plaintiffs served SANFT with a subpoena pursuant to F.R.C.P. 45 for the production of
6 documents regarding communications and payments made by and between Law Firm and the
7 Defendants during SANFT's representation of certain clients in personal injury claims for which
8 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

9 2. SANFT has reviewed and is aware that Plaintiffs have subpoenaed several law firms
10 seeking the same type of information pursuant to Rule 45 in this case, as well as a companion sister-
11 lawsuit *Allstate v. Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

12 3. SANFT understands that this Court presides over both the instant matter as well as the
13 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
14 firms to produce the same type of documents requested of SANFT.

15 4. Upon information and belief a stipulated confidentiality and protective order in this
16 case entered between Plaintiffs and Defendants for the disclosure of confidential, sensitive or other
17 protected information was approved by this Court on May 20, 2016. (ECF No. 39).

18 5. SANFT was not a party to the stipulated confidentiality and protective order. (ECF No.
19 39).

20 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
21 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

22 7. In accordance with this Court's prior rulings, both in this action and in the *Belsky*
23 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
24 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
25 39) be extended in their entirety to cover SANFT in its compliance with Plaintiffs' subpoena.

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3 8. SANFT will produce all documents responsive to the subpoena within ten (10) days
4 of approval and entry of this Order by the Court.

5 IT IS SO STIPULATED.

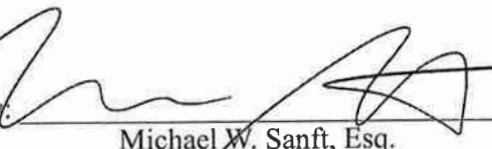
6 Dated: 1/4/19

Dated: January 4, 2019

7 McCORMICK, BARSTOW, SHEPPARD,
8 WAYTE & CARRUTH LLP

SANFT LAW

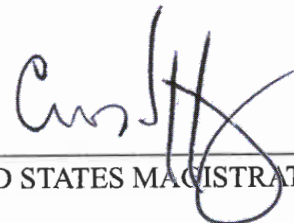
9 By: 
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By: 
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15
16 **ORDER**

17 IT IS SO ORDERED.

18 DATED this 14 day of January, 2019.

19 
20 UNITED STATES MAGISTRATE JUDGE
21

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